

Compliance Evaluation Inspection Report

USPS White Plains - Vehicle Maintenance Facility

White Plains, NY

November 29, 2022



Written by:

X

Enforcement Officer
ECAD-CAPSB-CAS USEPA R2

Approved by:

X

Chief - Compliance Assurance Section
ECAD-CAPSB-CAS USEPA R2

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COMPLIANCE EVALUATION INSPECTION REPORT

U.S. Environmental Protection Agency, Region 2
Enforcement and Compliance Assurance Division
290 Broadway, 21st floor
New York, New York 10007-1866

Locational Information

Facility Name: USPS White Plains - Processing & Distribution Center
& Vehicle Maintenance Facility
Facility Address: 1000 Westchester Ave, White Plains, NY 10610
Latitude & Longitude: 41.022653, -73.727796

ICIS & other Program ID Codes as appropriate

FRS: 110004401585
ICIS: 1400013215
CAA: 020000003611957020

Sector Information

Federal Facility: Yes
SIC: 4311 (U.S. Postal Service)
NAICS: 491110 (U.S. Postal Service)

Environmental Sensitivity Information

Potential Flood-Prone Area: No (See Appendix B: FEMA Flood Map)
Sole Source Aquifer: No (See Appendix C: Sole Source Aquifer Map)
Potential EJ Concerns: No (See Appendix D: EJ SCREEN)

Inspection Information

Date of Inspection: November 29, 2022
Inspector(s): Erin Floto

Facility Representative(s):

Name	Title	Phone	Email
Darren Peebles	Manager of VMF		Darren.p.peebles@usps.gov

Corrections/Updates for EPA Databases: N/A

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1. INTRODUCTION

The Region 2 office of the Environmental Protection Agency (EPA) inspected this facility for the Clean Air Act (CAA) because the facility had not been inspected by the EPA for that statute since 2009. A screening for other environmental and worker safety aspects was also conducted during the time on-site via the U.S. EPA Region 2 Inspector's Multi-Media Checklist. The inspection was unannounced. Note: The inspection was a partial compliance evaluation (PCE) of the property conducted specifically at the United States Postal Service (USPS) Vehicle Maintenance Facility (VMF). The VMF has a separate CAA permit and a separate chain of command from the processing and distribution center (PDC) located at the same address. Therefore, the inspection of the VMF was conducted separately.

I arrived at 9AM, checked in with the security guard, presented EPA credentials to Mr. Darren Peebles, Manager of the VMF, offered in- and out-briefings, and the opportunity to claim confidential business information. At the inspection, I was also accompanied by an inspector-in-training, Ms. Jillian Harvey-Shepard, who was receiving on-the-job training.

The VMF performs maintenance on the fleet of USPS delivery vehicles for the USPS White Plains district. The facility includes a body shop, light duty bays, battery/transmission and tire repair areas, a paint mixing station and parts storage. In addition, the facility has a spray paint booth and car wash that is no longer in operation.

2. FACILITY TOUR

We held an opening meeting with Mr. Peebles to discuss the VMF's applicability under the CAA. The facility has multiple parts washers and two air conditioning units with ozone depleting substances (ODS). The facility also has a spray paint booth that, according to Mr. Peebles was taken out of service by a contractor. However, he was unsure if it had been fully decommissioned and removed from the permit by the New York State Department of Environmental Conservation (NYSDEC). Note: The PDC portion of the property also has boilers, an emergency generator, and additional ODSs that were not included in this inspection for reasons noted in the introductory section above.

Following the opening meeting and discussion of applicability, we toured the facility with Mr. Danny Hill, an office worker at the VMF, since Mr. Peebles was new to the facility and had a meeting about to begin. We started our tour by inspecting the VMF's multiple parts washers, which include the primary stationary unit (Photo 1), two portable units (Photos 2), and an additional portable parts washer specifically for servicing breaks (Photo 3).

Following the parts washers, we visited the spray paint booth that is currently not in service. The paint booth is being used as a storage area for the facility (Photo 4). Mr. Hill described the filters being removed and disposed of as hazardous waste. However, he did not believe it was fully decommissioned and stated that the vent from the paint booth to the roof of the building was not capped. Mr. Hill stated that the paint booth has not been used and has been considered out of commission by the facility since 2017. He also stated that no one has been trained since that time.

In addition, the facility has a secondary room to the side of the paint booth that uses the roof vent. The secondary room is used only for mixing paint by hand (Photo 5). Outside of the paint room, there was painting occurring on a vehicle; however, it was done using an aerosol spray paint can. At the time of the painting, the staff member was not using a mask and EPA brought that to the attention of the VMF manager during the closing meeting.

Next, we visited the car wash. The automatic car wash portion of the location no longer is in operation. All car washes are currently being done by hand using a hose. At the time of the inspection, the catch basin near the car port door was overflowing (Photo 6) and a catch basin in the middle of the car wash contained water (Photo 7). There was not, however, evidence of oil sheen in either catch basin.

Following the walkthrough of the facility, we sat down with Mr. Peebles to have a closing meeting to discuss the walkthrough, our CAA observations, and next steps, including a records request. We also informed him about several screening observations outside of the CAA, including the staff member not wearing a mask while using the spray paint can and the fact that when we walked by the scent was quite strong; the lack of yellow treads on the stairs in the back storage room (Photo 8); and the full catch basins in the car wash area. I told Mr. Peebles that I would be sending an email with the full list of records I am requesting to complete the CAA evaluation.

3. RECORD REVIEW

I emailed Mr. Peebles the day after the inspection, on November 30, 2022, with the list of records requested. The documents were provided via email on December 15, 2022.

ODS

The documents related to the ODS refrigerants use by the VMF's two air conditioning units were not reviewed during this inspection because the maintenance staff responsible for the refrigeration units at the VMF are with the PDC management chain.

Spray Paint Booth

Mr. Peebles provided an email chain with VMF Northeast Area regional leadership, Ms. Donna Gill, and Mr. Howard Snowman, the Safety Manager for USPS White Plains, in May 2018 regarding the efforts to decommission the spray paint booth. While it has not been removed from the permit or decommissioned by the NYSDEC, the booth is currently not operable and has not been since May 2018; the VMF does not have anyone trained to conduct spray booth operations; and the booth is being used as a storage area in the facility.

Parts Washers

The facility uses aqueous cleaners from Safety-Kleen. The facility provided me the Safety Data Sheet (SDS) for the cleaner used with the parts washers. The solution used is less than 25 grams/liter and does not contain reactive volatile organic compounds (VOCs). This is consistent with the NYSDEC's updated regulation requirements for parts washers.

4. REGULATORY CONCERNS

Based on observations made during the inspection and/or a review of records related to the inspection, no regulatory concerns were identified under CAA for the VMF.

5. SCREENING CONCERNS

The following concerns were identified based on a screening for environmental, safety and health aspects via the U.S. EPA Region 2 Inspector's Multi-Media Checklist (see, Appendix E) and will be referred to the appropriate EPA, State and OSHA office for potential follow-up:

- Lack of yellow tape on stairs;
- Staff using strong aerosol spray paint can without mask of any kind;
- Spray paint booth not officially decommissioned by NYSDEC; and
- Full catch basins in car washing station.

6. ENVIRONMENTAL ASSISTANCE

To increase the Federal community's understanding and compliance with applicable environmental requirements, EPA, along with other Federal agencies, sponsor Fed Center, the Federal government's home for comprehensive environmental stewardship and compliance assistance information for Federal facility managers and their agencies. Fed Center can be accessed via the worldwide web at <https://www.fedcenter.gov/>

APPENDICES:

A: Photographs

B: FEMA Flood Map

C: Sole Source Aquifer Map

D: EJ Screen

E: EPA Region 2 Inspector's Multi-Media Checklist

Appendix A: INSPECTION PHOTOS

Photo 1 – Stationary parts washer



Photo 2 - Portable parts washer



Photo 3 – Brakes parts washers



Photo 4 – Paint booth storage



Photo 5 – Hand paint station



Photo 7 – Catch basin in car wash

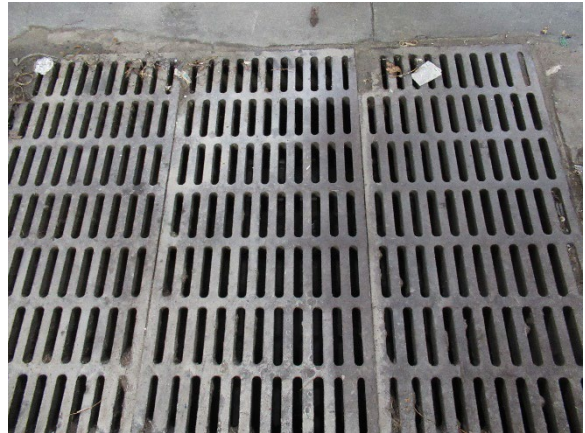


Photo 8 - Lack of yellow treads



Photo 6 – Catch basin in car wash



Appendix B: Federal Emergency Management Agency (FEMA) 100 Year Flood Zone and EPA's Region 2 Composite Flood Risk Layer

Facility Name: USPS White Plains –
Processing & Distribution Center & Vehicle Maintenance Facility



The facility is not located within a FEMA 100-year flood zone area.



The facility is not located within the EPA's Region 2 Composite Flood Risk potential risk area.

Appendix C: Sole Source Aquifer Map

Facility Name: USPS White Plains –
Processing & Distribution Center & Vehicle Maintenance Facility



The facility is not located within a Sole Source Aquifer area.

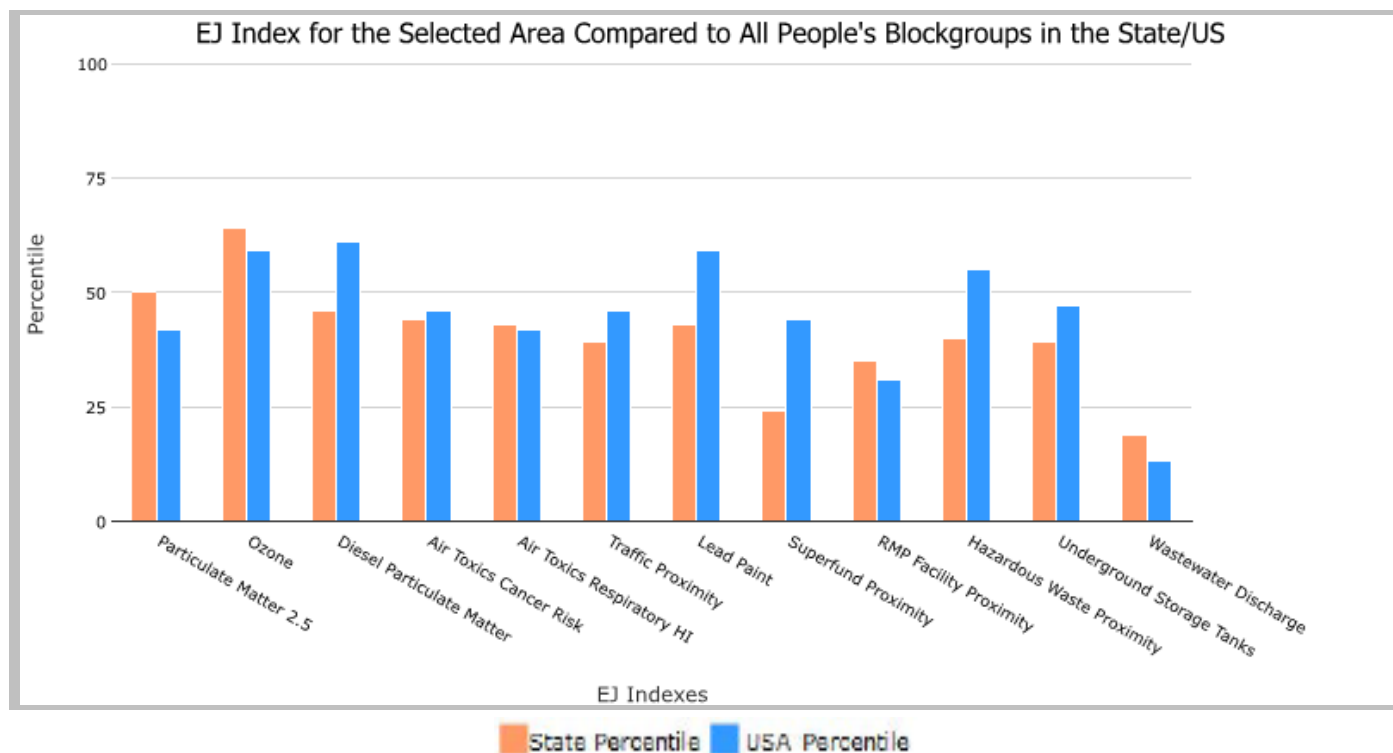
1 mile Ring Centered at 41.022654,-73.727794, NEW YORK, EPA Region 2

Approximate Population: 3,335

Input Area (sq. miles): 3.14

USPS White Plains

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
EJ Index for Particulate Matter 2.5	50	42
EJ Index for Ozone	64	59
EJ Index for Diesel Particulate Matter*	46	61
EJ Index for Air Toxics Cancer Risk*	44	46
EJ Index for Air Toxics Respiratory HI*	43	42
EJ Index for Traffic Proximity	39	46
EJ Index for Lead Paint	43	59
EJ Index for Superfund Proximity	24	44
EJ Index for RMP Facility Proximity	35	31
EJ Index for Hazardous Waste Proximity	40	55
EJ Index for Underground Storage Tanks	39	47
EJ Index for Wastewater Discharge	19	13



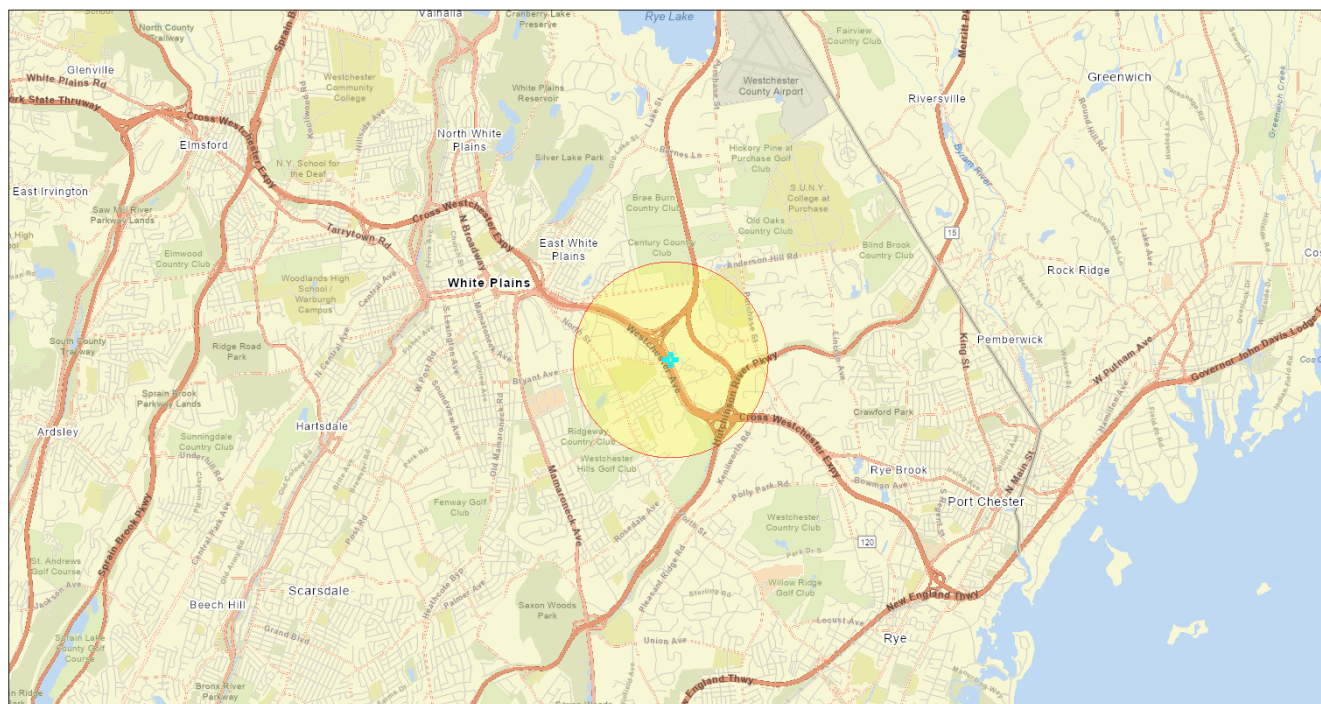
This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

1 mile Ring Centered at 41.022654,-73.727794, NEW YORK, EPA Region 2

Approximate Population: 3,335

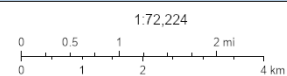
Input Area (sq. miles): 3.14

USPS White Plains



January 4, 2023

✚ USPS White Plains



County of Westchester, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc., METI/NASA, USGS, EPA, NPS, USDA

Sites reporting to EPA

Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.1)

1 mile Ring Centered at 41.022654,-73.727794, NEW YORK, EPA Region 2

Approximate Population: 3,335

Input Area (sq. miles): 3.14

USPS White Plains

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	8.4	7.86	58	8.67	44
Ozone (ppb)	44.4	41.5	98	42.5	71
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.464	0.637	50	0.294	80-90th
Air Toxics Cancer Risk* (lifetime risk per million)	30	29	67	28	80-90th
Air Toxics Respiratory HI*	0.35	0.39	55	0.36	60-70th
Traffic Proximity (daily traffic count/distance to road)	300	870	43	760	55
Lead Paint (% Pre-1960 Housing)	0.52	0.54	43	0.27	74
Superfund Proximity (site count/km distance)	0.052	0.24	20	0.13	45
RMP Facility Proximity (facility count/km distance)	0.15	0.52	32	0.77	28
Hazardous Waste Proximity (facility count/km distance)	1.9	6	38	2.2	69
Underground Storage Tanks (count/km ²)	1.6	7.7	40	3.9	55
Wastewater Discharge (toxicity-weighted concentration/m distance)	3.9E-06	4	21	12	14
Socioeconomic Indicators					
Demographic Index	21%	35%	37	35%	34
People of Color	28%	45%	47	40%	49
Low Income	19%	29%	42	30%	35
Unemployment Rate	6%	6%	64	5%	64
Limited English Speaking Households	1%	8%	47	5%	58
Less Than High School Education	9%	13%	49	12%	51
Under Age 5	3%	6%	29	6%	26
Over Age 64	17%	17%	57	16%	57

*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

For additional information, see: www.epa.gov/environmentaljustice

EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.



U.S. EPA REGION 2

INSPECTOR'S MULTI-MEDIA SCREENING CHECKLIST

Facility Name and ID: USPS White Plains – VMF 110004401585	Facility Point of Contact and Title: Darren Peebles Manager of VMF
Facility Address: 1000 Westchester Ave, White Plains, NY 10610	Facility POC Phone and E-mail: Darren.p.peebles@usps.gov
Inspector Name and Phone: Erin Floto	Date of Inspection: 11/29/2022

Make referrals directly via email only to Erin Floto, Multi-Media Referrals Coordinator (MMRC)

Floto.Erin@epa.gov

Date of Referral: 1/4/2023

Supervisors may be cc'd on email

****Guidance for completing the Multi-Media Inspection Checklist****

The Multi-Media Screening Checklist should be filled out during the visit.

Inspectors are not expected to be experts in all media. If something looks odd or suspicious, use the provided questions, document and take photos of the suspicious activity. If you answer “YES” to any of the questions below, inform the MMRC that you observed possible non-compliance in another program area during your inspection and send the checklist including comments and photographs to complete the referral.

Inspectors should record preliminary observations on this checklist, which can assist in determining compliance at a later date. Compliance determinations are not made in the field.

Please remember when submitting this checklist to provide comments and photos for each section you observe possible non-compliance activities, if possible

AIR

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe dark or white smoke or dust clouds from any source?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe opaque (obscuring) smoke being emitted for >5 minutes? (If possible, take video)
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you notice any unusual odors or strong chemical smells?

WATER

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe poorly maintained equipment/containers exposed to precipitation?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe pollutants (e.g. petroleum, oil, chemicals, sediments, process water, etc.) going into an indoor floor drain or outdoor catch basin?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe a discharge from a pipe to surface water that was turbid or had a strange odor, color, sheen or foam?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe heavy (earth-moving) equipment adjacent to apparent wetland areas?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any clearing, filling, dredging, ditching, construction, etc. being conducted on or over the wetland areas?

HAZARDOUS WASTE AND CHEMICALS

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe evidence in work areas, storage areas or laboratories of abandoned containers or materials? Please note as much information about the contents of the containers and types of materials, including their chemical/physical properties as possible in comments along with the reason believe they have been 'abandoned'.
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any containers or tanks that contained materials/substances that were leaking, damaged, or in poor condition? Please note as much information about the contents of the containers or tanks as possible in comments, including their chemical/physical properties along with the condition of the containers/tanks.

PESTICIDES

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe pesticides sold in unlabeled containers or with hand-written labels or with labels with no English?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe possible improper use of pesticides (adverse human reaction, dead animals, plant damage, etc.) or storage of pesticides (open containers, unconstrained gas canisters, no ventilation in storage room, etc.)?

TOXIC AND HAZARDOUS SUBSTANCES/MATERIALS

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any liquid-filled electrical equipment or hydraulic systems that the facility representative confirmed were installed pre-1980?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any electrical equipment leaking or did you observe stains on the floor or concrete pad near such equipment?

TOXICS RELEASE INVENTORY

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	1. Does the facility have 10 or more full-time employees?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	2. Is the facility classified under any of the following sectors? <div style="display: flex; justify-content: space-between; width: 100%;"> ___ manufacturing ___ metal mining </div>

		___petroleum bulk terminal	___solvent recovery services
		___electric utility	___chemical wholesale
		___commercial hazardous waste treatment	___coal mining
<input type="checkbox"/> Yes	<input type="checkbox"/> No	If 1 and 2 are YES, ask: 3. Is the facility aware of EPCRA Section 313 or the Toxic Release Inventory requirements?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No	4. Is the facility aware of recent reporting threshold reductions of listed chemicals manufactured, processed, or used?	

***** For TRI questions, please only refer if questions 3 and 4 are "No" *****

OIL STORAGE/SPILLS

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe rainbow sheen or foam on surface waters or ground or next to storm drain?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did the facility have an oil spill within the last 12 months that reached surface waters?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe any automatic tank gauge in alarm status for underground storage tanks (USTs)?

EMERGENCY RESPONSE & PREVENTION

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe an oil spill or chemical spill into secondary containment, storm drain, or a waterway?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Is the facility under emergency operations, evacuation, or shelter in place due to an actual chemical or oil release, or potential for chemical or oil release?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe a chemical, flammable, or oil release, including a spill or explosion, into the air, water, or soil?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe process equipment in poor condition that could result in a release? (corrosion, lack of maintenance)

WORKER SAFETY

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	Did you observe employees working in dangerous conditions (excessive noise, chemical exposure, at heights above 10ft) without proper PPE?
<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Did you observe employees entering or working in confined spaces (vaults, pits, tanks, enclosures not designed for occupancy) with limited access/ingress/egress?

COMMENTS AND PHOTOGRAPHS:

Following your visit, please use this section to type detailed comments concerning possible non-compliance activities and photographic evidence of those activities. Please include the media title for each comment.

OSHA: Observed stairs without yellow safety tape. Additionally, strong chemical smells were present follow spray painting and the worker was not using a mask of any kind.